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**From:** Donovan, William [donovan.william@epa.gov]  
**Sent:** 9/23/2020 11:54:01 AM  
**To:** Blankinship, Amy [Blankinship.Amy@epa.gov]  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Amy,

Thank you for clarifying the units. I'll run the PCA-refined EDWCs.

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**From:** Blankinship, Amy <Blankinship.Amy@epa.gov>  
**Sent:** Wednesday, September 23, 2020 7:48 AM  
**To:** Donovan, William <donovan.william@epa.gov>  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi,

Jim confirmed they are in ppm (mg/L).

Thanks,  
Amy

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**From:** Donovan, William <donovan.william@epa.gov>  
**Sent:** Wednesday, September 23, 2020 7:40 AM  
**To:** Blankinship, Amy <Blankinship.Amy@epa.gov>  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Amy,

I understand that the water models typically give EDWCs in ug/L (ppb). Our dietary model requires concentrations in ppm (mg/L). So if the files you send are already converted to ppm I can use those values directly. However, if they are in ppb then I will need to make the conversion prior to use. Thanks,

Will

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**From:** Blankinship, Amy <Blankinship.Amy@epa.gov>  
**Sent:** Tuesday, September 22, 2020 7:27 PM  
**To:** Donovan, William <donovan.william@epa.gov>  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Will,

I have asked the team, but I was also told that those values do not include the PCA adjustments that we could also consider (a interim step to considering the complete PCA/PCT analysis). As such, we will also be sending those values as they may be a better representation of what to use for your work.

Sorry for the hiccup.

Amy

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**From:** Donovan, William <[donovan.william@epa.gov](mailto:donovan.william@epa.gov)>  
**Sent:** Tuesday, September 22, 2020 3:36 PM  
**To:** Blankinship, Amy <[Blankinship.Amy@epa.gov](mailto:Blankinship.Amy@epa.gov)>  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Thanks Amy! Are these in ppm?

Will

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**From:** Blankinship, Amy <[Blankinship.Amy@epa.gov](mailto:Blankinship.Amy@epa.gov)>  
**Sent:** Tuesday, September 22, 2020 3:34 PM  
**To:** Rate, Debra <[Rate.Debra@epa.gov](mailto:Rate.Debra@epa.gov)>; Donovan, William <[donovan.william@epa.gov](mailto:donovan.william@epa.gov)>  
**Cc:** Metzger, Michael <[Metzger.Michael@epa.gov](mailto:Metzger.Michael@epa.gov)>; Johnson, Marion <[Johnson.Marion@epa.gov](mailto:Johnson.Marion@epa.gov)>; Adeeb, Shanta <[Adeeb.Shanta@epa.gov](mailto:Adeeb.Shanta@epa.gov)>; Lin, James <[lin.james@epa.gov](mailto:lin.james@epa.gov)>; Went, Stephen <[Wente.Stephen@epa.gov](mailto:Wente.Stephen@epa.gov)>  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi,

Attached are the surface water timeseries for 3 different incorporation depths (1.5, 2.0, and 3.0 inches) for HED to do their DEEM runs. Let us know if you have any questions or concerns.

Thanks,  
Amy

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**From:** Rate, Debra <[Rate.Debra@epa.gov](mailto:Rate.Debra@epa.gov)>  
**Sent:** Tuesday, September 15, 2020 6:56 AM  
**To:** Donovan, William <[donovan.william@epa.gov](mailto:donovan.william@epa.gov)>; Blankinship, Amy <[Blankinship.Amy@epa.gov](mailto:Blankinship.Amy@epa.gov)>  
**Cc:** Metzger, Michael <[Metzger.Michael@epa.gov](mailto:Metzger.Michael@epa.gov)>; Johnson, Marion <[Johnson.Marion@epa.gov](mailto:Johnson.Marion@epa.gov)>; Adeeb, Shanta <[Adeeb.Shanta@epa.gov](mailto:Adeeb.Shanta@epa.gov)>  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Thank you, Will!

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**From:** Donovan, William <[donovan.william@epa.gov](mailto:donovan.william@epa.gov)>  
**Sent:** Monday, September 14, 2020 7:44 PM  
**To:** Blankinship, Amy <[Blankinship.Amy@epa.gov](mailto:Blankinship.Amy@epa.gov)>; Rate, Debra <[Rate.Debra@epa.gov](mailto:Rate.Debra@epa.gov)>  
**Cc:** Metzger, Michael <[Metzger.Michael@epa.gov](mailto:Metzger.Michael@epa.gov)>; Johnson, Marion <[Johnson.Marion@epa.gov](mailto:Johnson.Marion@epa.gov)>; Adeeb, Shanta <[Adeeb.Shanta@epa.gov](mailto:Adeeb.Shanta@epa.gov)>  
**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Debra,

Yes, I could run the dietary assessment assuming no domestic grapefruit use and will run the water values once they are available. On leave tomorrow but can start setting things up later this week. Thanks,

Will

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**From:** Blankinship, Amy <[Blankinship.Amy@epa.gov](mailto:Blankinship.Amy@epa.gov)>  
**Sent:** Monday, September 14, 2020 5:56 PM  
**To:** Rate, Debra <[Rate.Debra@epa.gov](mailto:Rate.Debra@epa.gov)>; Donovan, William <[donovan.william@epa.gov](mailto:donovan.william@epa.gov)>  
**Cc:** Metzger, Michael <[Metzger.Michael@epa.gov](mailto:Metzger.Michael@epa.gov)>; Johnson, Marion <[Johnson.Marion@epa.gov](mailto:Johnson.Marion@epa.gov)>; Adeeb, Shanta

<Adeeb.Shanta@epa.gov>

**Subject:** RE: Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi,

Thanks for confirming the label parameters. EFED does have numbers that we can provide HED. Currently, our EDWCs are based on the shallowest depth of 2 inches. We would need to run new numbers with a 1.5 in. I don't know how much difference there will be, but we can scope that out before we send any numbers to HED.

Thanks,  
Amy

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**From:** Rate, Debra <Rate.Debra@epa.gov>

**Sent:** Monday, September 14, 2020 5:00 PM

**To:** Blankinship, Amy <Blankinship.Amy@epa.gov>; Donovan, William <donovan.william@epa.gov>

**Cc:** Metzger, Michael <Metzger.Michael@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Adeeb, Shanta <Adeeb.Shanta@epa.gov>

**Subject:** Aldicarb - Request - Modeling worst case with current water distribution numbers

Hi Amy, Will,

Sorry it has taken a bit of time for me to get back to you following the last team meeting.

Marion has met with Marietta and she does want to know what the current dietary risk picture is with water numbers – so there will be a before and after picture of the risk once EFED has applied the new modeling/refinements.

Amy, does EFED have current water distribution numbers (surface water) that can be provided to Will (HED) to use in the DEEM run? Do you need to do any additional work to get these numbers? Will, would you be able to run the DEEM when you get the new numbers?

Amy: Additionally, the registrant has confirmed that the incorporation depth and well setback numbers provided on the proposed labeling are correct (i.e., 2-3 inches incorporation). Even though the registrant says 2-3 inches incorporation, based on the conversation with the registrant and BEADs research, I think we are hoping that you might be able to run a range of depths that would also include 1.5 inches (max. depth stated on call with registrant in January '20).

Will: When we were discussing the status of our reviews with the registrant, we planted the seed that they may want to begin thinking about other crops/uses that may need to be cancelled to allow for the citrus uses. They said that it would be unlikely that the registrant would cancel any existing uses, but that maybe they would consider letting go of grapefruit. Would it also be possible to do a DEEM run for food alone without the grapefruit use to let us see how much room in the risk cup might be gained?

We really appreciate your help in running these extra modeling runs/scenarios. Please let me know if you have any questions.

Many thanks!  
Debra

Debra Rate, Ph.D.  
Senior Regulatory Specialist  
Invertebrate & Vertebrate Branch 2  
Registration Division  
U.S. Environmental Protection Agency

Phone: 703-306-0309